BEFORE THE TENNESSEE REGULATORY AUTHORITY NASHVILLE, TENNESSEE

IN RE:

APPLICATION OF MEMPHIS NETWORX, LLC FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY TO PROVIDE INTRASTATE TELECOMMUNICATION SERVICES AND JOINT PETITION OF MEMPHIS LIGHT GAS & WATER DIVISION, A DIVISION OF THE CITY OF MEMPHIS, TENNESSEE ("MLGW") AND A&L NETWORKS-TENNESSEE, LLC ("A&L") FOR APPROVAL OF AGREEMENT BETWEEN MLGW AND A&L REGARDING JOINT OWNERSHIP OF MEMPHIS NETWORX, LLC.

DOCKET NO. 99-00909

RESPONSES OF THE TENNESSEE CABLE TELECOMMUNICATIONS ASSOCIATION TO THE DATA REQUESTS OF MEMPHIS NETWORX, LLC, MLGW AND A&L

COMES NOW, the Tennessee Cable Telecommunications Association ("TCTA"), and responds to the data requests of Memphis Networx, MLG&W, and A&L as follows:

REQUEST NO. 1. Please provide a list of each member of the Tennessee Cable Telecommunications Association ("TCTA") including the name, address and geographical area where each member provides cable telecommunications services.

RESPONSE: The question asks for information that is not relevant to any issue or admissible in this proceeding, and the information asked for is neither admissible nor reasonably calculated to lead to the discovery of admissible evidence.

Without waiving the above objection, the TCTA responds to the request as follows:



The name and address of each member-operator of the Tennessee Cable Telecommunications Association is attached. Each of these operators provide services in the geographical area of their address.

REQUEST NO. 2. Do any of the TCTA members or their affiliates provide local or long distance telephone services in the state of Tennessee, which are regulated by the Tennessee Regulatory Authority? If so, please identify the entity (name and address) and describe the services offered and the geographical area in which they are offered.

RESPONSE: The question asks for information that is not relevant to any issue in this proceeding, and the information asked for is neither admissible nor reasonably calculated to lead to the discovery of admissible evidence.

Without waiving the above objection, the TCTA responds to the request as follows:

The information referenced by this data request is not provided to the Tennessee Cable Telecommunications Association by its members and, therefore, the TCTA has no knowledge or control of any information which would be responsive to this request.

Respectfully submitted,

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